

EXHIBIT 8



From: Michael Hassard <Michael@torekeland.com>
Sent: Thursday, October 13, 2022 4:24 PM
To: Brandy Peery <bpeery@lawdcm.com>; Tor Ekeland <tor@torekeland.com>
Cc: Ricardo Cedillo <rcedillo@lawdcm.com>; David Apple <jdapple@applefinklaw.com>; Nicole Guitelman <nicoleg@torekeland.com>
Subject: RE: [External] Cantu v. Guerra - Plaintiffs' Responses to Dr. Guerra's Interrogatories & Final Discovery Production

Brandy,

We disagree.

Best,
Michael Hassard

From: Brandy Peery <bpeery@lawdcm.com>
Sent: Wednesday, October 12, 2022 6:36 PM
To: Michael Hassard <Michael@torekeland.com>; Tor Ekeland <tor@torekeland.com>
Cc: Ricardo Cedillo <rcedillo@lawdcm.com>; David Apple <jdapple@applefinklaw.com>; Nicole Guitelman <nicoleg@torekeland.com>
Subject: RE: [External] Cantu v. Guerra - Plaintiffs' Responses to Dr. Guerra's Interrogatories & Final Discovery Production

Counsel:

Per my prior email correspondence (attached), the following written discovery requests were served on Plaintiffs on August 15, 2022:

- *Dr. Guerra' First Set of Interrogatories to Plaintiff, Dr. Rodrigo Cantu*
- *Dr. Guerra' First Set of Interrogatories to Plaintiff, Melody Joy Cantu.*
- *Dr. Guerra's Third Requests for Production to Melody Joy Cantu*
- *Dr. Guerra's Second Requests for Production to Dr. Rodrigo Cantu*

Pursuant to Rule 33(b) and 34(b)(2)(A), Plaintiffs' objections and responses to the foregoing requests for written discovery were due Wednesday, September 14, 2022 (withing 30 days after date of service). The objections to interrogatories you sent on September 15th were untimely and, are therefore waived by Plaintiffs.

Furthermore, damages (including the amounts and dates incurred) are an essential element of Plaintiffs' purported CFAA and Texas common law claims. Plaintiffs' refusal to respond to Defendant's interrogatories seeking specific information regarding Plaintiffs' alleged damages

based upon boilerplate objections that the interrogatories are overbroad, unduly burdensome, and *irrelevant* is a violation of the discovery rules and a derogation of Defendant's right to fair notice of Plaintiffs' claims.

Lastly, Plaintiffs have failed to submit any written responses to *Dr. Guerra's Third Requests for Production to Melody Joy Cantu* or *Dr. Guerra's Second Requests for Production to Dr. Rodrigo Cantu*. These responses were due on September 14, 2022.

Please immediately serve, without objections, Plaintiffs' responses to the foregoing interrogatories and requests for production. If Plaintiffs continue to fail and/or refuse to respond to these requests for written discovery, we will file a motion to compel and for sanctions with the Court.

Brandy C. Peery
Shareholder

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ATTORNEYS AT LAW

Note: New Suite Number

OFFICE: 210-822-6666
FAX: 210-660-3795
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From: Michael Hassard Michael@torekeland.com

Sent: Thursday, September 15, 2022 8:01 PM

To: Brandy Peery bpeery@lawdcm.com; David Apple jdapple@applefinklaw.com

Cc: Tor Ekeland <tor@torekeland.com>

Subject: [External] Cantu v. Guerra - Plaintiffs' Responses to Dr. Guerra's Interrogatories & Final Discovery Production

Counsel,

Please see attached responses to Dr. Guerra's First Set of Interrogatories. I have also attached a link for Discovery Production from Mrs. Cantu and Dr. Cantu.

Link for Final Discovery Production:

<https://app.box.com/s/ydtpgvcong5o9v5gvo36044rdnk321y1>

Michael Hassard
Associate Attorney

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& TorMark Law, LLP
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From: [Brandy Peery](#)
To: [Tor Ekeland](#); [Michael Hassard](#); [Rain Minns](#)
Cc: [David Apple](#); [Ricardo Cedillo](#); [Nicole Guitelman](#)
Subject: Cantu v. Guerra - Plaintiffs' Responses to Dr. Guerra's Written Discovery Due on Sept 14, 2022
Date: Thursday, September 15, 2022 5:14:00 PM
Attachments: [image001.jpg](#)

Counsel:

The following written discovery requests were served on Plaintiffs on August 15, 2022:

- *Dr. Guerra' First Set of Interrogatories to Plaintiff, Dr. Rodrigo Cantu*
- *Dr. Guerra' First Set of Interrogatories to Plaintiff, Melody Joy Cantu.*
- *Dr. Guerra's Third Requests for Production to Melody Joy Cantu*
- *Dr. Guerra's Second Requests for Production to Dr. Rodrigo Cantu*

Pursuant to Rule 33(b) and 34(b)(2)(A), Plaintiffs' objections and responses to the foregoing requests for written discovery were due Wednesday, September 14, 2022 (withing 30 days after date of service), but we did not receive any such objections or responses from Plaintiffs. Accordingly, Plaintiffs have waived Plaintiffs' objections to such discovery requests due to their failure to timely object . Please immediately serve, without objections, Plaintiffs' responses to the foregoing interrogatories and requests for production.

Brandy C. Peery

Shareholder

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